

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Richmond Division)**

[illegible]

MOTION FOR ADMISSION
PRO HAC VICE OF JOSEPH A. FRIEDMAN

Lisa Taylor Hudson (the “Movant”), a member in good standing of the Bar of the Commonwealth of Virginia, counsel at the law firm of Sands Anderson Marks & Miller, P.C., and an attorney admitted to practice before this Court, hereby moves this Court for entry of an *Order* permitting Joseph A. Friedman, Esquire, an attorney with Kane Russell Coleman & Logan, P.C., to appear *pro hac vice* before this Court in the referenced bankruptcy cases before the United States Bankruptcy Court for the Eastern District of Virginia (the “Bankruptcy Case”) on behalf of McAlister Square Partners, Ltd., Mansfield SEQ 287, and Debbie, Ltd., whom are represented by Sands Anderson Marks & Miller, P.C. as local counsel in this matter (collectively, the “Landlords”) pursuant to *Local Bankruptcy Rule* 2090-1(E)(2). In support thereof, Movant states as follows:

C. Thomas Ebel, Esquire – VSB #18637
William A. Gray, Esquire – VSB #46911
Peter M. Pearl, Esquire – VSB #22344
Lisa Taylor Hudson, Esquire – VSB #45484
Sands, Anderson, Marks & Miller, P.C.
801 East Main Street, Suite 1800
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Local Counsel for Reverend Dwayne Funches, Individually, and as Independent Executor of the Estates of Travis Funches, Dione Funches, and Dwayne Funches, Jr., Emily Funches, Lovera S. Funches, and Shatira Funches, Individually; Monument Consulting, LLC; McAlister Square Partners, Ltd., Mansfield SEQ 287 and Debbie, Ltd.; UTC I, LLC; PrattCenter, LLC; Valley Corners Shopping Center, LLC; Cynthia Olloway, Individually and as a Special Administrator of the Estate of Cedric Coy Langston, Jr., a Deceased Minor; Vornado Gun Hill Road, LLC; Amherst VF LLC; East Brunswick VF LLC; North Plainfield VF LLC; Alexander's Rego Park Center, Inc.; Towson VF LLC; Green Acres Mall LLC; Wayne VF LLC; VNO Mundy Street LLC; VNO TRU Dale Mabry, LLC; CSI Shopping Company

1. Joseph A. Friedman, a non-resident of the Eastern District of Virginia, is a member in good standing of the bar of the State of Texas, and admitted to practice before the state court in Texas, as well as before the U.S. District Courts for the Northern, Southern, Eastern, and Western Districts of Texas and the Western District of Oklahoma, and the U.S. Court of Appeals for the Fifth Circuit. There are no disciplinary proceedings pending against Joseph A. Friedman.

2. Movant requests that this Court admit Joseph A. Friedman to practice before this Court for the purpose of filing pleadings in, to appear and be heard at hearings concerning, and to otherwise participate in the Bankruptcy Case (and related proceedings) on behalf of the Landlords in the jointly-administered Chapter 11 bankruptcy cases commenced by Circuit City Stores, Inc., *et al.* (the “Debtors”).

3. Movant and her law firm shall serve as co-counsel with Mr. Friedman in the Bankruptcy Case (and related proceedings).

4. A copy of this *Motion for Admission Pro Hac Vice of Joseph A. Friedman* (the “*Motion*”) will be served upon all parties that are to receive service.

5. Pursuant to *Local Bankruptcy Rule* 9013-1(G), and because there are no novel issues of law presented in this *Motion*, Movant requests waiver of the requirement that all motions be accompanied by written memoranda of law.

WHEREFORE, Movant respectfully requests that the Court enter an *Order* substantially in the form annexed hereto as Exhibit A, permitting Joseph A. Friedman to appear and be heard *pro hac vice* in association with Movant as counsel to the Landlords, in the Debtors’ Chapter 11 bankruptcy cases, and grant such other relief as deemed necessary and appropriate.

Dated: December 4, 2008

SANDS, ANDERSON, MARKS & MILLER, P.C.,

/s/ Lisa Taylor Hudson
C. Thomas Ebel, Esquire – VSB #18637
William A. Gray, Esquire – VSB #46911
Peter M. Pearl, Esquire – VSB #22344
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CERTIFICATE OF SERVICE

I hereby certify that on this 4th day of December, 2008, a true and accurate copy of the foregoing was electronically filed with the Clerk of the Court for the Eastern District of Virginia, Richmond Division, using the CM/ECF system, which thereby caused the above to be served electronically on all registered users of the ECF system that have filed notices of appearance in this matter, and was mailed, by U.S. Mail, first class, postage prepaid, to all persons on the attached Service List.

/s/ Lisa Taylor Hudson

SERVICE LIST

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20 North Eighth Street, Second Floor
Richmond, Virginia 23219

COUNSEL FOR THE OFFICIAL
COMMITTEE OF UNSECURED CREDITORS

/s/ Lisa Taylor Hudson

Exhibit A

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Richmond Division)**

In re: CIRCUIT CITY STORES, INC., et al.,) Case No. 08-35653-DOT
Debtors.) (Chapter 11)
) (Jointly Administered)
)

**ORDER GRANTING ADMISSION
PRO HAC VICE OF JOSEPH A. FRIEDMAN**

Upon consideration of the *Motion for Admission Pro Hac Vice of Joseph A. Friedman* (the “*Motion*”), filed in the above-styled matter by Lisa Taylor Hudson, a member of the Bar in this Court and its appearing that the *Motion* having been served upon counsel for Circuit City Stores, Inc. *et al.* (collectively, the “Debtors”) and the Office of the Trustee for the Eastern District of Virginia; and after due deliberation and sufficient cause appearing therefore, it is hereby accordingly,

ORDERED ADJUDGED & DECREED that, pursuant to the requirements of *Local Bankruptcy Rule* 2090-1(E)(2), Joseph A. Friedman be and is hereby permitted to appear and be heard *pro hac vice* as counsel for Mansfield SEQ 287 and Debbie, Ltd., as landlord that is represented by Sands Anderson Marks & Miller, P.C. in this matter (collectively, the “Landlords”) in these jointly-administered Chapter 11 bankruptcy cases.

Dated: December 4, 2008

The Honorable Kevin R. Huennekens
United States Bankruptcy Court for Eastern District
of Virginia, Richmond Division

I ask for this:

/s/ Lisa Taylor Hudson
C. Thomas Ebel, Esquire – VSB #18637
William A. Gray, Esquire – VSB #46911
Peter M. Pearl, Esquire – VSB #22344
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LOCAL BANKRUPTCY RULE 9022-1 CERTIFICATION

Pursuant to Local Bankruptcy Rule 9022-1 (C), I hereby certify that the foregoing proposed Order has been endorsed by or served upon all necessary parties.

/s/ Lisa Taylor Hudson